1	ROGER P. CROTEAU, ESQ.				
2	Nevada Bar No. 4958 TIMOTHY E. RHODA, ESQ.				
	Nevada Bar No. 7878				
3	ROGER P. CROTEAU & ASSOCIATES, LTD. 2810 W. Charleston Blvd., #67				
4	Las Vegas, Nevada 89102 (702) 254-7775				
5	(702) 228-7719 (facsimile)				
6	croteaulaw@croteaulaw.com Attorney for Defendant				
7	THUNDER PROPERTIES, INC.				
8					
9					
10					
	UNITED STATES DISTRICT COURT				
11	DISTRICT OF NEVADA				
12	***				
13	US BANK NATIONAL ASSOCIATION, AS )				
14	TRUSTEE FOR THE SPECIALTY )				
15	UNDERWRITING AND RESIDENTIAL ) FINANCE TRUST AND MORTGAGE LOAN ) Case No. 3:16-cv-00501-RCJ-CSD				
16	ASSET-BACKED CERTIFICATES SERIES ) 2006-BC4, )				
17	) Plaintiff, )				
	)				
18	VS. )				
19	WOODLAND VILLAGE; WESTLAND REAL ) ESTATE DEVELOPMENT AND )				
20	INVESTMENTS; THUNDER PROPERTIES, ) INC.; AND PHIL FRINK & ASSOCIATES, )				
21	INC.,				
22	Defendants. )				
23	)				
24	ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT AND				
25	MOTION TO STAY DISCOVERY				
	(Second Request)				
26	COMES NOW, Defendant, THUNDER PROPERTIES, INC., and Plaintiff, US BANK				
27	NATIONAL ASSOCIATION, AS TRUSTEE FOR THE SPECIALTY UNDERWRITING AND				
28					
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Page 1 of 4

17655 Little Peak

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RESIDENTIAL FINANCE TRUST AND MORTGAGE LOAN ASSET-BACKED CERTIFICATES SERIES 2006-BC4, by and through their undersigned counsel, and hereby stipulate and agree as follows:

- On March 26, 2024, Plaintiff caused a Motion for Summary Judgment and Motion for Protective Order or Motion to Stay Discovery to be filed herein. [ECF #91, 92, 93].
- 2. On April 8, 2024, the parties submitted a stipulation to extend the deadline to respond to the subject motions until April 30, 2024. [ECF #94]. Said stipulation was granted on April 9, 2024. [ECF #95].
- 3. Since the filing of the last stipulation, the parties have been actively engaged in settlement discussions. Settlement has been complicated by the involvement of interested parties that are not parties to the litigation. The parties believe that a settlement is reasonably possible and they wish to devote their resources to fully exploring an amicable resolution before expending additional funds on briefing.

Page 2 of 4

## Case 3:16-cv-00501-RCJ-CSD Document 97 Filed 04/30/24 Page 3 of 4

1	4.	Defendant has requested ar	nd shall be granted an extension of time to respond to	
2		Plaintiff's Motion for Sum	mary Judgment and Motion for Protective Order or	
3		Motion to Stay Discovery	until May 24, 2024.	
4	5.	This Stipulation is made in	good faith and not for purpose of delay.	
5	Dated this day of April, 2024.			
6	ROGER P. C ASSOCIAT		AKERMAN, LLP	
7	ASSOCIAT	11.5, 11.15.	AKLIGIAN, LLI	
8	/s/ Timothy I	F Rhoda	/s/ Scott R. Lachman	
9		E. RHODA, ESQ.	SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016	
10		rleston Blvd., #67	DONNA M. WITTIG, ESQ. Nevada Bar No. 11015	
11	(702) 254-77	775 ecroteaulaw.com	1635 Village Center Circle, Suite 200 Las Vegas, NV 89134	
12	Attorney for I	Defendant	(702) 634-5000 scott.lachman@akerman.com	
13	Thunder 110	perues, me.	donna.wittig@akerman.com  Attorney for Plaintiff	
14			U.S. Bank National Association	
15			IT IS SO ORDERED	
16				
17			By: Judge, U.S. District Court	
18			11	
19			Dated: April 30, 2024	
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	Case 3:16-cv-00501-RCJ-CSD Document 96 Filed 04/29/24 Page 4 of 4				
1	<u>CERTIFICATE OF SERVICE</u>				
2	I HEREBY CERTIFY that on this29 <sup>th</sup> day of April, 2024, I served via the				
3	United States District Court CM/ECF electronic filing system, the foregoing <b>STIPULATION</b>				
4	AND ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY				
5	JUDGMENT AND MOTION TO STAY DISCOVERY (Second Request) to the following				
6	parties:				
7	Melanie D Morgan Donna M. Wittig				
8	Akerman LLP Akerman LLP 1635 Village Center Circle, Suite 200 Akerman LLP 1635 Village Center Circle				
9	Las Vegas, NV 89134 Ste 200 (702)634-5005 Las Vegas, NV 89134				
10	(702) 380-8572 (fax) 702-634-5000 melanie.morgan@akerman.com donna.wittig@akerman.com				
11	Attorney for Plaintiff US Bank US Bank				
12	Scott Robert Lachman				
13	Akerman LLP 1635 Village Center Circle, Suite 200				
14	Las Vegas, NV 89134 702-634-5021				
15	scott.lachman@akerman.com Attorney for Plaintiff				
16	US Bank				
17					
18	<u>/s/ <i>Timothy E. Rhoda</i></u> An employee of ROGER P. CROTEAU &				
19	ASSOCIATES, LTD.				
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21					
22					
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24					
<ul><li>25</li><li>26</li></ul>					
27					
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Page 4 of 4

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17655 Little Peak